



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

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Via ECF

MEMO ENDORSED

Hadassa R. Waxman
Member of the Firm
d +1.212.969.3040
f 212.969.2900
HWaxman@proskauer.com
www.proskauer.com

6/12/23

Self-Surrender date extended
to JUNE 27, 2023.

The Honorable Colleen McMahon, USDJ
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Re: United States v. Patrick Hill, 20 Cr. 521 (CM)

Dear Judge McMahon:

We respectfully submit this letter to request that Mr. Hill's self-surrender date, currently scheduled for Tuesday, June 20, 2023, be adjourned for a very brief period, to a date after June 23, 2023. An adjournment will permit Mr. Hill to attend the eighth-grade graduation of his younger daughter and the high school graduation of his older daughter. Both graduations are scheduled for June 23, 2023.

In addition, after the Court amended Mr. Hill's Judgment of Conviction, BOP redesignated Mr. Hill to the Lewisburg facility in Pennsylvania. Although Lewisburg is closer to Mr. Hill's home than the original designation of McKean, Lewisburg is still a half-day trip from family, making visitations onerous. As the Court may recall, Lewisburg is not one of the three facilities – Otisville, Fairton, and Fort Dix – Your Honor recommended in the amended Judgment. Counsel will use any adjournment to continue to work with BOP to redesignate Mr. Hill to one of the three aforementioned facilities.

We make this request with the deepest gratitude to Your Honor for her compassion and sensitivity in adjourning Mr. Hill's surrender date on several occasions to facilitate his redesignation to a BOP facility closer to home. We hope that the Court does not view this request as greedy, given the thoughtful and, frankly, generous approach with which Your Honor has ruled on our previous adjournment requests. We thought that because the graduations are only three days after Mr. Hill's current surrender date, it would not be wholly inappropriate to seek just a few extra days, primarily so that Mr. Hill's severely learning-disabled younger daughter could have her father present at her graduation – an event that for this particular child is truly extraordinary.

Proskauer»

June 12, 2023

Page 2

The government takes no position with respect to the adjournment request.

We thank Your Honor for her consideration.

Respectfully submitted,

/s/ Hadassa Waxman
Hadassa Waxman, Esq.

cc: Frank Balsamello, AUSA
Marguerite Colson, AUSA
Jun Xiang, AUSA